

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

APRIL PLOEGER,

Plaintiffs,

v.

**TRUSTEES OF THE UNIVERSITY
OF PENNSYLVANIA,**

Defendant.

Case No. 2:22-CV-02389-JHS

**PLOEGER'S ADDITIONAL
STATEMENT OF UNDISPUTED
FACTS IN OPPOSITION TO
PENN'S MOTION FOR SUMMARY
JUDGMENT**

PLOEGER'S ADDITIONAL STATEMENT OF UNDISPUTED FACTS

1. On July 9, 2021, PLOEGER told PENN she was planning to return from her 2016 leave of absence. She also told PENN she would likely need disability accommodations. She also reminded PENN that she had, and has no intention of letting go, numerous disputes with PENN regarding its treatment of her in violation of the Americans with Disabilities Act. This is all while PLOEGER is actively suing PENN, alleging various ADA and Title IX violations. Bates D_170.

2. On July 14, 2021, PLOEGER submitted her request to return from leave. In that document she blamed SDS's violation of the ADA for her being on leave. Bates D_204-206.

3. PLOEGER was on leave from Spring 2016 through the present. She attempted to return in 2017, 2018, 2021, and 2022. ECF 36-2, Exhibit 11, Bates D_109 and 1255).

4. On February 8, 2016, PLOEGER informed PENN that her upcoming leave was not medical. Bates D_10.

Respectfully submitted on July 10, 2025

THE TRIAL LAW FIRM, LLC

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